



GOLDBERG SEGALLA<sup>LLP</sup>

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July 16, 2015

Hon. Cathy Seibel  
Charles L. Briant United States Courthouse  
300 Quarropas Street  
White Plains, NY 10601-4150

**Re: The Wave Studio, LLC v. American Express Co., Case No. 15-cv-03420**  
**The Wave Studio, LLC v. General Hotel Mgmt. Ltd., Case No. 13-cv-9239**  
**Our File No.: 6390.0546**

Dear Judge Siebel:

I am writing as counsel for Setai Owners LLC, a defendant in The Wave Studio case under Case No. 13-cv-9239.

Like Orbitz, Setai Owners LLC is an interested party in the related case against American Express. American Express has sought contractual indemnification from Setai Owners LLC with respect to the claims asserted against American Express in Case No. 15-cv-03420.

Setai Owners LLC joins American Express's letter request for a stay made July 2, 2015 (Docket No. 43 in 15-cv-03420). Both cases involve alleged infringement claims relating to many of the same photographs. Setai Owners LLC submits that both cases be stayed together to avoid unnecessarily litigating the same issues multiple times.

Respectfully Submitted,

Daniel B. Moar

DBM/sw